

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION

RICKY GUINN
PLAINTIFF

VS.

COMBINED OILFIELD SERVICES, LLC
ANDREW JORDAN SERVICES, LLC,
AND ANDREW JORDAN, INDIVIDUALLY
DEFENDANTS

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CIVIL ACTION NO. 6:24-cv-483-JDK

DEFENDANTS' UNOPPOSED MOTION FOR LEAVE
TO FILE FIRST AMENDED ANSWER

COMES NOW, Defendants Combined Oilfield Services, LLC ("COS"), Andrew Jordan Services, LLC ("AJS"), and Andrew Jordan ("Jordan"), individually (collectively, "Defendants") file their Motion for Leave to File First Amended Answer as follows:

1. Plaintiff filed his Original Complaint on December 29, 2024.
2. Defendants filed their Original Answer on January 31, 2025.
3. The Court's deadline to file amended pleadings is April 28, 2025. (Doc. 8).
4. After a factual investigation, Defendants seek to amend their Answer to add affirmative defenses related to FLSA exemptions applicable to Plaintiff.
5. Defendants attach as Exhibit A to the Motion a copy of the First Amended Answer.

WHEREFORE, Defendants respectfully request that this Court enter an order allowing Defendants to amend their answer, and all other and further relief to which they may be justly entitled.

Respectfully submitted,

/s/ Eric Kolder
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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service April 28, 2025. Local Rule CV-5(a)(3)(A).

/s/ Eric Kolder
ERIC KOLDER

CERTIFICATE OF CONFERENCE

Defendants' counsel conferred with Plaintiff's counsel on April 28, 2025, and Plaintiff is unopposed to this Motion.

/s/ Eric Kolder
Eric Kolder